

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that, pursuant to sections 342 and 1109(b) of title 11 of the United States Code (as amended and applicable to the above-captioned bankruptcy cases, the “Bankruptcy Code”), 11 U.S.C §§ 101-1532, Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2002-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, Benesch, Friedlander, Coplan & Aronoff LLP (“Benesch”) hereby appears as counsel to Promax Manufacturing Co., Ltd. (“Promax”) in the above-captioned bankruptcy cases (the “Bankruptcy Cases”).

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<sup>1</sup> An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware directing joint administration of the chapter 11 cases of: JOANN Inc., Case No. 25-10068 (CTG); JOANN Holdings 1, LLC, Case No. 25-10069 (CTG); JOANN Holdings 2, LLC, Case No. 25-10070 (CTG); Needle Holdings LLC, Case No. 25-10071 (CTG); Jo-Ann Stores, LLC, Case No. 25-10072 (CTG); Creative Tech Solutions LLC, Case No. 25-10073 (CTG); Creativebug, LLC, Case No. 25-10074 (CTG); WeaveUp, Inc., Case No. 25-10075 (CTG); JAS Aviation, LLC, Case No. 25-10076 (CTG); joann.com, LLC, Case No. 25-10077 (CTG); JOANN Ditto Holdings Inc., Case No. 25-10078 (CTG); Jo-Ann Stores Support Center, Inc., Case No. 25-10079 (CTG); and Dittopatterns, LLC, Case No. 25-10080 (CTG). The docket in Case No. 25-10068 (CTG) should be consulted for all matters affecting this case. All further pleadings and other papers shall be filed in and all further docket entries shall be made in the docket of JOANN Inc., Case No. 25-10068 (CTG).

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Rules 2002, 3017, and 9007, the undersigned requests that copies of all notices, pleadings, and all other papers required to be served in the Bankruptcy Cases be served upon the following persons, and that such persons be added to the mailing matrix in the Bankruptcy Cases:

Kevin M. Capuzzi  
John C. Gentile  
Steven L. Walsh  
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PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code sections 342 and 1109(b), the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules set forth above, but also includes, without limitation, any orders and notices of any notices, application, complaint, demand, motion, petition, pleading, disclosure statement or plan of reorganization, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, overnight, or hand delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the Bankruptcy Cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, filing, claim, or suit is not intended nor shall be deemed to waive the rights of Promax to: (1) have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) have final orders in a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed

findings of fact and conclusions of law and a de novo review by a district court judge; (3) trial by jury in any case, proceeding, matter, or controversy so triable; (4) have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; (5) maintain any objection to the jurisdiction and/or venue of the Bankruptcy Court or any other court for any purpose; or (6) assert any other rights, claims, actions, defenses, setoffs, or recoupments to which Promax is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: February 19, 2025  
Wilmington, Delaware

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

/s/ Kevin M. Capuzzi  
Kevin M. Capuzzi (DE 5462)  
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*Counsel to Promax Manufacturing Co., Ltd.*

**CERTIFICATE OF SERVICE**

I, Kevin M. Capuzzi, hereby certify that on February 19, 2025, a true and correct copy of the foregoing *Notice of Appearance* was served to all parties of record via CM/ECF.

/s/ Kevin M. Capuzzi  
Kevin M. Capuzzi (DE 5462)